1 2 3 4 5	GERI LYNN GREEN (SBN 127709) Law Offices of Geri Lynn Green, LC A Law Corporation 700 Montgomery Street San Francisco, CA 94111 T: (415) 982-2600 F: (415) 358-4562 gerilynngreen@gmail.com			
6 7	Attorney for Defendant: PRINCE THEO JOHNSON			
8				
9	IN THE UNITED STATES DISTRICT COURT			
10	IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA			
11	SAN FRANCISCO DIVISION			
12				
13	UNITED STATES OF AMERICA, ) No. CR 07-0156 MMC			
14	Plaintiff, ) STIPULATION AND [PROPOSED]			
15	ORDER CONTINUING MOTION FILING vs.  DATE FROM APRIL 2, 2008 TO APRIL			
16	) 16, 2008 AND ASSOCIATED DATES )  PRINCE THEO JOHNSON			
17	PRINCE THEO JOHNSON, ) Defendants. )			
18				
19	The matter is presently on this Court's calendar for hearing on defense motions on May 15			
20				
21	2008 with the motions to be filed on April 2, 2008. Due to the fact that the parties have engaged in serious plea negotiations and that the nature of the evidence required to file the defense motions is			
22	serious plea negotiations and that the nature of the evidence required to file the defense motions is			
23	evidence that is of a particularly sensitive nature, the defense requests and the government has no objection to a request that the date for filing the defense motions be continued to allow for the			
24	finalization of the plea negotiations.			
25				
26	The parties therefore stipulate and request the Court to continue the motions filing date from April 2, 2008 to April 16, 2008 and to continue the associated dates as follows:			
27				
$_{28}$				

Stip to Continue- U.S. v. Johnson CR 07-0156 MMC

## 

1		Presently Scheduled Date	<b>Proposed Date</b>		
2	Defendant's Motions to be filed	April 2, 2008	April 16, 2008		
3	Responses to be filed	April 16, 2008	April 30, 2008		
4	Reply to be filed	April 23, 2008	May 8, 2008		
5	Hearing Date	May 15, 2008.	Remains the same		
6	Since there is no request to change the hearing date, there is no need to exclude time.				
7	IT IS SO STIPULATED.	IS SO STIPULATED.			
8	DATED: April 2, 2008				
9		/S/			
10		WILLIAM FRENTZEN Assistant United States A	Attorney		
11	DATED: April 2, 2008				
12		GERI LYNN GREEN			
13		Attorney for Prince John	son		
14					
17	IT IC CO ODDEDED TI	41 41 (111 41 111 41 1	1.6 4 :12 2000 4		
15		e the motions filing date will be continued	I from April 2, 2008 to		
	IT IS SO ORDERED. The continue April 16, 2008 and the associated date	ates continued as follows:			
15	April 16, 2008 and the associated da	ates continued as follows:  Presently Scheduled Date	Proposed Date		
15 16	April 16, 2008 and the associated da Defendant's Motions to be filed	Presently Scheduled Date April 2, 2008	<b>Proposed Date</b> April 16, 2008		
15 16 17	April 16, 2008 and the associated da  Defendant's Motions to be filed  Responses to be filed	Presently Scheduled Date April 2, 2008 April 16, 2008	Proposed Date April 16, 2008 April 30, 2008		
15 16 17 18	April 16, 2008 and the associated date of the description of the descr	April 16, 2008 April 23, 2008	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008		
15 16 17 18 19	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date	April 2, 2008 April 23, 2008 April 23, 2008 May 15, 2008.	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same		
15 16 17 18 19 20	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date	April 16, 2008 April 23, 2008	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same		
15 16 17 18 19 20 21	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date  Since there is no request to change to	April 2, 2008 April 23, 2008 April 23, 2008 May 15, 2008.	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same		
15 16 17 18 19 20 21 22	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date	April 2, 2008 April 16, 2008 April 23, 2008 May 15, 2008. The hearing date, there is no need to exclude	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same de time.		
15 16 17 18 19 20 21 22 23	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date  Since there is no request to change to	April 2, 2008 April 16, 2008 April 23, 2008 May 15, 2008. The hearing date, there is no need to exclude the hearing date.	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same de time.		
15 16 17 18 19 20 21 22 23 24	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date  Since there is no request to change to	April 2, 2008 April 16, 2008 April 23, 2008 May 15, 2008. The hearing date, there is no need to exclude	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same de time.		
15 16 17 18 19 20 21 22 23 24 25	April 16, 2008 and the associated day  Defendant's Motions to be filed  Responses to be filed  Reply to be filed  Hearing Date  Since there is no request to change to	April 2, 2008 April 16, 2008 April 23, 2008 May 15, 2008. The hearing date, there is no need to exclude the hearing date.	Proposed Date April 16, 2008 April 30, 2008 May 8, 2008 Remains the same de time.		

Stip to Continue- U.S. v. Johnson CR 07-0156 MMC